

***IN THE DISTRICT COURT OF THE UNITED STATES***  
***for the Western District of New York***

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**January 2020 GRAND JURY**  
**(Impaneled 01/03/2020)**

**THE UNITED STATES OF AMERICA**

**SUPERSEDING INDICTMENT**  
**20-CR-180-V**

**-vs-**

**SAMUEL MARA**

**Violations:**  
Title 18, United States Code,  
Sections 875(c) and 2261A(2)(B)  
(2 Counts)

**COUNT 1**

**(Threats by Interstate Communications)**

**The Grand Jury Charges That:**

On or about June 6, 2020, in the Western District of New York, and elsewhere, the defendant, **SAMUEL MARA**, did knowingly, willfully, and unlawfully, and for the purpose of issuing a threat and with knowledge that the communications would be viewed as a threat, transmit communications in interstate commerce, that is, a video posted on the internet website "Facebook" which traveled between the State of New York and the State of California, which contained a threat to injure the person of another, specifically, Victim 1, a person known to the Grand Jury.

**All in violation of Title 18, United States Code, Section 875(c).**

**COUNT 2**

**(Cyberstalking)**

**The Grand Jury Further Charges That:**

From on or about June 6, 2020, to on or about July 29, 2020, in the Western District of New York, and elsewhere, the defendant, **SAMUEL MARA**, with the intent to harass and intimidate another person, that is, Victim 1, a person known to the Grand Jury, did use an electronic communication service, an electronic communication system of interstate commerce, and a facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause, substantial emotional distress to Victim 1.

**All in violation of Title 18, United States Code, Section 2261A(2)(B).**

DATED: Buffalo, New York, November 24, 2020.

JAMES P. KENNEDY, JR.  
United States Attorney

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A TRUE BILL:

S/FOREPERSON